

# EXHIBIT E

**From:** [Nathan, Aaron E.](#)  
**To:** [Joseph Cammarata, Esq.](#); [Houghton-Larsen, M Annie](#)  
**Cc:** [Goverski, Meryl Conant](#); [Gottlieb, Michael](#)  
**Subject:** RE: Freeman v. Giuliani - Initial Disclosures  
**Date:** Friday, December 6, 2024 4:26:55 PM

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Joe:

With respect to Mr. Giuliani's compliance with today's Court-ordered deadlines relating to the Turnover and Receivership Order, because those are Court-ordered deadlines any extension would need to be sought from the Court. We would not oppose an extension to Sunday at 5pm if one is timely sought. With respect to the supplemented interrogatory responses and initial disclosures, we agree to an extension to Sunday at 5pm, but will not agree to further extensions beyond that time.

Please be sure to copy my colleagues on any correspondence going forward to ensure your message is seen. Thanks,

**Aaron E. Nathan**  
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**From:** Nathan, Aaron E.  
**Sent:** Friday, December 6, 2024 4:12 PM  
**To:** 'Joseph Cammarata, Esq.' <[Joe@CammarataLawPC.com](mailto:Joe@CammarataLawPC.com)>; Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>  
**Cc:** Goverski, Meryl Conant <[MGoverski@willkie.com](mailto:MGoverski@willkie.com)>; Goverski, Meryl Conant <[MGoverski@willkie.com](mailto:MGoverski@willkie.com)>  
**Subject:** RE: Freeman v. Giuliani - Initial Disclosures

Joe, I will respond to this message shortly. For any communications between now and tomorrow evening, please make sure you continue to copy Ms. Goverski and Ms. Houghton-Larsen; otherwise, my team will not see your messages.

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**From:** Joseph Cammarata, Esq. <[Joe@CammarataLawPC.com](mailto:Joe@CammarataLawPC.com)>  
**Sent:** Friday, December 6, 2024 4:03 PM  
**To:** Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>  
**Cc:** Goverski, Meryl Conant <[MGoverski@willkie.com](mailto:MGoverski@willkie.com)>; Goverski, Meryl Conant <[MGoverski@willkie.com](mailto:MGoverski@willkie.com)>  
**Subject:** RE: Freeman v. Giuliani - Initial Disclosures

\*\*\* EXTERNAL EMAIL \*\*\*

Mr. Nathan,

I will have the inventory segregation, supplemented responses to interrogatories and responses to the first and second request for productions as well shortly, which have voluminous document production that will be transmitted I have been working on this all day. Would you be amenable to an extension of time until 5 pm on Sunday in lieu of the previous 5 pm deadline for today. I am working diligently to get everything to you this weekend. It is likely I will have the inventory to you today. As you know I am solely handling this, Thank you in advance for the consideration of a courtesy extension.

Regards,

Joseph Cammarata Esq.  
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**From:** Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>

**Sent:** Wednesday, December 4, 2024 10:05 AM

**To:** Joseph Cammarata, Esq. <[Joe@CammarataLawPC.com](mailto:Joe@CammarataLawPC.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>

**Cc:** Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>

**Subject:** RE: Freeman v. Giuliani - Initial Disclosures

Joe,

We consent to your request to serve supplemented responses to Plaintiffs' first set of interrogatories by Friday December 6 at 5 p.m.

However, we reiterate our request that you confirm the accuracy of Mr. Giuliani's initial disclosures or provide updated disclosures by no later than this Friday December 6 at 12 p.m.

Thank you,

**M.Annie Houghton-Larsen**

**Willkie Farr & Gallagher LLP**

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Pronouns: she, her, hers

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**From:** Joseph Cammarata, Esq. <[Joe@CammarataLawPC.com](mailto:Joe@CammarataLawPC.com)>

**Sent:** Wednesday, December 4, 2024 9:12 AM

**To:** Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>

**Cc:** Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>

**Subject:** Re: Freeman v. Giuliani - Initial Disclosures

**\*\*\* EXTERNAL EMAIL \*\*\***

I am requesting an extension of time today to get the supplemented responses until Friday December 6, 2024 at 5 pm.

Regards,

Joseph Cammarata, Esq.

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On Dec 3, 2024, at 11:47 AM, Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)> wrote:

Joe,

Further to the below email, Defendant's untimely responses to Plaintiffs' First Set of Interrogatories are facially deficient and require supplementation. Please complete your responses to these interrogatories **by no later than 5pm tomorrow, December 4, 2024**. Below, we identify only those deficiencies that we believe are critical to Plaintiffs' efforts at this time, not all of the deficiencies. Plaintiffs reserve the right to supplement our request at a later date.

1. With respect to Interrogatory #3, the interrogatory asks Defendant to identify "all" documents he intends to rely on to support his homestead contention, but the response is "not limited to" the listed documents and "reserves the right to submit and use" "other documents" that are not disclosed in the interrogatory response. Defendant is required to supplement this response accordingly.
2. With respect to Interrogatory #4, Defendant's objection is waived because it is untimely. Fed. R. Civ. P. 33(b)(4). Further, Defendant's objection is meritless

because the interrogatory seeks the identities of “any financial, medical, or legal professional or firm” that Defendant consulted within the relevant period and that information is not protected from disclosure by any privilege. Moreover, Defendant has waived any such privilege by disclosing the identities of attorneys he has consulted in his response to Interrogatory #5. Defendant is required to supplement this response accordingly.

3. With respect to Interrogatory #8, Defendant’s objection is waived because it is untimely. Fed. R. Civ. P. 33(b)(4). Further, Defendant’s objection is meritless because the stated objection does not constitute a valid basis to withhold responsive information. Defendant is required to supplement this response accordingly.
4. With respect to Interrogatory #9, Defendant’s response does not include the requested “detail” and therefore is facially deficient. Defendant is required to supplement this response accordingly.

Thank you,  
Aaron

**Aaron E. Nathan**  
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**From:** Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>  
**Sent:** Monday, December 2, 2024 6:38 PM  
**To:** Joseph Cammarata, Esq. <[Joe@CammarataLawPC.com](mailto:Joe@CammarataLawPC.com)>  
**Cc:** Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>  
**Subject:** Freeman v. Giuliani - Initial Disclosures

Joe,

Thank you for providing Mr. Giuliani’s responses to Plaintiffs first set of interrogatory responses. We are continuing to review the responses and expect that we will be following up regarding the deficiency of many of them.

In the interim, we wanted to confirm that Mr. Giuliani’s initial disclosures, which I am attaching here for your convenience, remain accurate. Specifically, the disclosure that the only witness he intends to rely on is himself in light of the responses to interrogatory requests 1, 2, 5, and 6. We ask that you confirm the accuracy of Mr. Giuliani’s initial disclosures or provide updated disclosures by no later than this Friday December 6 at 12 p.m.

Thank you,  
Annie

**M. Annie Houghton-Larsen**

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Pronouns: she, her, hers

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